

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Amanda K. Joas	:	19-14896-pmm
aka Amanda Katherine Joas	:	Chapter 13
aka Amanda Joas	:	
Debtor(s)	:	
	:	
Pennsylvania Housing Finance Agency	:	
Movant	:	
vs.	:	
	:	
Amanda K. Joas	:	
aka Amanda Katherine Joas	:	
aka Amanda Joas	:	
Debtor(s)	:	
	:	
Scott F. Waterman	:	
Trustee	:	

**ANSWER TO MOTION OF PENNSYLVANIA HOUSING FINANCE AGENCY FOR  
RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362**

AND NOW COMES Debtor, by and through her attorneys, and in Answer to the Motion of Pennsylvania Housing Finance Agency for Relief from Stay avers:

1. Admitted.
2. Admitted.
3. Denied. Debtor lacks sufficient information and belief to admit or deny the averments of paragraph 3 and such are therefore denied.
4. Admitted.
5. Admitted.
6. Denied. Debtor lacks sufficient information and belief to admit or deny the averments of paragraph 6 and such are therefore denied.
7. Denied. Debtor lacks sufficient information and belief to admit or deny the averments of paragraph 6 and such are therefore denied.

8. Denied to the extent the averments of paragraph 8 are anything other than a statement or conclusion of law that does not require a response.
9. Denied to the extent the averments of paragraph 9 are anything other than a statement or conclusion of law that does not require a response.

WHEREFORE, Debtor respectfully prays this Honorable Court for an Order that the Motion of Pennsylvania Housing Finance Agency for relief from stay be denied and for such other and further relief as the Honorable Court deems just and appropriate.

**NEWMAN WILLIAMS, P.C.**

By: /s/ Robert J. Kidwell  
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